

HEATHER E. WILLIAMS, #122664
Federal Defender
MEGAN T. HOPKINS, #294141
Assistant Federal Defender
801 I Street, 3rd Floor
Sacramento, CA 95814
Tel: 916-498-5700/Fax: 916-498-5710

Attorney for Defendant
BRYAN PAUL TAMBLYN

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	Case No. 2:20-cr-00014-KJM
)	
Plaintiff,)	STIPULATION FOR TEMPORARY
)	MODIFICATION OF CONDITIONS OF PRETRIAL
vs.)	RELEASE; [PROPOSED] ORDER
)	
BRYAN PAUL TAMBLYN,)	Hon. Allison Claire
)	
Defendant.)	
)	
)	

The defendant, BRYAN PAUL TAMBLYN, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Christina McCall, hereby stipulate to and request an order from this Court temporarily modifying the conditions of Mr. Tamblyn's pretrial release to permit him to work in the driveway area of his residence, which is outside of the electronic monitoring zone, as follows:

Saturday, May 16, 2020 from 8:00 a.m. to 5:00 p.m.

Sunday, May 17, 2020 from 8:00 a.m. to 5:00 p.m.

Monday, May 18, 2020 from 8:00 a.m. to 5:00 p.m.

Mr. Tamblyn is currently on pretrial release in this district on a \$50,000 unsecured appearance bond, as well as an appearance bond secured by deeds of trust and co-signed by his uncle, Jerome Espinosa and grandfather, Richard Espinosa. See Dkt. 26 (unsecured appearance bond) and Dkt. 29 (appearance bond secured by deeds of trust).

1 Mr. Tamblyn is in compliance with his conditions of release. One of those conditions of
2 release is location monitoring. Mr. Tamblyn is subject to home detention, and therefore must
3 remain inside his residence at all times except for employment; education; religious services;
4 medical, substance abuse, or mental health treatment; attorney visits; court appearances; court
5 ordered obligations; or other activities pre-approved by the pretrial services officer¹.

6 Mr. Tamblyn requests, and the parties agree and so stipulate, that his Conditions of
7 Release be temporarily amended to specifically permit him to work in his grandfather's
8 driveway, under his grandfather, Richard Espinosa's, supervision, for the period(s) of time set
9 forth above.

10 Mr. Espinosa hopes to have his driveway repaved, and in order to do so needs a large
11 amount of brush, debris, and portions of the existing driveway removed from the area. It will
12 also be necessary to level the area and prepare it for the pouring of new cement. Mr. Tamblyn is
13 experienced in this line of work and estimates that in total, the job could take between three and
14 four days of labor. However, Mr. Tamblyn hopes to be able to complete it in three consecutive
15 eight-hour days, in order to save his grandfather the expense of hiring outside labor. Mr.
16 Espinosa is a third party custodian and resides with Mr. Tamblyn, and will be present to
17 supervise Mr. Tamblyn while he is working on the drive, outside of the electronic monitoring
18 area.

19 The proposed temporarily amended condition is attached to this request. The parties do
20 not request a hearing in this matter in light of this stipulation.

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27 ¹ Pretrial services interprets this condition to only permit their approval of other activities which are deemed
28 "essential," with all other activities requiring the approval of the Court. The pretrial services officer who supervises
Mr. Tamblyn advised defense counsel that this specific request would require the approval of the Court, because it is
not considered an "essential" activity.

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DATED: May 15, 2020

Respectfully submitted,
HEATHER E. WILLIAMS
Federal Defender

/s/ Megan T. Hopkins
MEGAN T. HOPKINS
Assistant Federal Defender
Attorney for BRYAN PAUL TAMBLYN

DATED: May 15, 2020

MCGREGOR SCOTT

United States Attorney

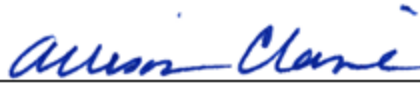
/s/ Christina McCall
CHRISTINA MCCALL
Assistant United States Attorney
Attorney for the United States

[PROPOSED] ORDER

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the Special Conditions of Release for defendant, Bryan Paul Tamblyn, be Temporarily Amended such that he is permitted to work in the driveway area of his residence, under the supervision of third party custodian Richard Espinosa, between the hours of 8:00 a.m. and 5:00 p.m. on Saturday, May 16 – Monday, May 18, 2020. At no time is Mr. Tamblyn to leave his residence. While in the front yard of his residence, Mr. Tamblyn shall be in the presence of his grandfather (Third-Party Custodian). All other conditions of pretrial release shall remain in force.

The Temporary Amended Special Condition of Release is hereby adopted.

DATED: May 15, 2020


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE